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June 12, 2008

BY FACSIMILE

Honorable Barbara S. Jones
Daniel Patrick Moynihan Building
United States Courthouse
500 Pearl Street, Room 620
New York, New York 10007

Re: United States of America v. Saunders, et al.
(07 Cr. 3 (BSJ))

Dear Judge Jones:

We represent defendant Tyrone Moore in the above-captioned matter. We write on behalf of Mr. Moore to respectfully request a three-week extension of Mr. Moore's deadline to file motions, which is currently set for June 16, 2008. Our firm was substituted as counsel on May 16, 2008, and we are still in the process of evaluating the voluminous set of documents and electronic surveillance recordings produced by the Government in discovery. Additionally, we are in discussions to resolve the matter with the United States Attorney's Office and hope to reach a final agreement in the next two weeks.

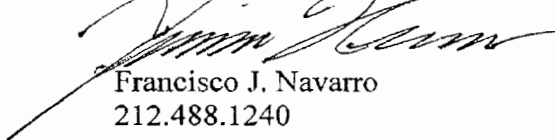
Accordingly, Mr. Moore respectfully requests that he be permitted to file his motions on July 7, 2008, and that the Government's response, which is currently due on July 18, 2008, be due on August 8, 2008. Mr. Moore's also requests that he be permitted to file a reply brief, which is currently due on August 1, 2008, by August 22, 2008. This is Mr. Moore's first request for an extension of these deadlines.

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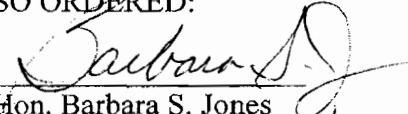
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We have consulted with Assistant United States Attorney David Harbach, and he has informed us that the Government has no objection to this request. Thank you for your consideration of this matter.

Respectfully submitted,


Francisco J. Navarro
212.488.1240

SO ORDERED:


Hon. Barbara S. Jones
6/12/08

cc: David Harbach, Assistant United States Attorney
All Counsel of Record